UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

EAGLE STAR INSURANCE COMPANY Civil Action No.: 13 CV 3410 HB/DCF LIMITED and HOME AND OVERSEAS INSURANCE COMPANY LIMITED,

Petitioners,

VS.

NOTICE OF MOTION TO INTERVENE AND TO UNSEAL JUDICIAL DOCUMENTS

ARROWOOD INDEMNITY COMPANY, f/k/a ROYAL INDEMNITY COMPANY,

Respondent,

and

EMPLOYERS INSURANCE COMPANY OF WAUSAU; STRONGHOLD INSURANCE COMPANY LIMITED; ALLSTATE INSURANCE COMPANY; NATIONWIDE MUTUAL INSURANCE COMPANY; NATIONAL CASUALTY COMPANY,

Movant-Intervenors.

PLEASE TAKE NOTICE, that upon the accompanying affidavits and exhibits, together with the memorandum of law Employers Insurance Company of Wausau, Nationwide Mutual Insurance Company, National Casualty Company, Stronghold Insurance Company Limited, and Allstate Insurance Company will move the Court for an Order permitting intervention pursuant to Federal Rule of Civil Procedure 24(b) for the limited purpose of unsealing the final arbitration award.

Date: June 28, 2013 LARSON • KING, LLP

By: /s/ Daniel C. Adams

Keith A. Dotseth (210304) (pro hac vice pending) Hilary J. Loynes (0389050) (pro hac vice pending)

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Company

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